

# Exhibit 21

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**From:** [Powell, Amy \(CIV\)](#)  
**To:** [Konkoly, Antonia \(CIV\)](#); [Gadeir Abbas](#); [Lena F. Masri, Esq.](#); [Ahmed Mohamed](#); [Jack Cooper](#); [shereef@akeelvalentine.com](mailto:shereef@akeelvalentine.com)  
**Cc:** [Roth, Dena M. \(CIV\)](#)  
**Subject:** RE: December 29 meet and confer  
**Date:** Friday, December 29, 2017 2:50:00 PM

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Also, Gadeir, I checked in with TSA, who confirmed my understanding of where we were with respect to SSI. While we have generally taken the position that Plaintiffs should not be granted access to SSI because they are unlikely to be able to demonstrate substantial need, we indicated at the discovery conference that we could put counsel through the background check process.

While you may not have needed to reapply while Mohamed was ongoing, you probably do now if you want to seek access to SSI through 525(d). If you still want to do so, you should write a letter to TSA (feel free to send it through us) to initiate the background check process. In addition to asking to initiate the process, the letter should seek access to specific SSI, and state why you think you have a substantial need for the specific type of information sought. I'm happy to facilitate the process as much as possible, and feel free to call me with any questions, but we do need a specific request, in writing.

Amy

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**From:** Konkoly, Antonia (CIV)  
**Sent:** Friday, December 29, 2017 2:18 PM  
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**Subject:** December 29 meet and confer

Gadeir,

Thanks for chatting this morning. To briefly summarize and commemorate our call:

- You sought clarification on TSC RFAS Nos. 5-7, 12-18, 20-22, 24, 26-55 and DHS TRIP RFAS Nos. 25-64. We will confer with the agencies and get back to you as soon as possible with a response. We understand that you intend to move to compel with respect to those discovery requests as soon as next Tuesday. The parties agreed that a somewhat elongated

briefing schedule would be appropriate for that motion (if one is filed), due to both the New Year holiday and the need for defendants to, at minimum, prepare declarations in order to assert appropriate privileges. We'll confer with our clients on that aspect and get back to you.

- You agreed to check Ali's availability for deposition on either January 5 or 9. We further agreed that the proposed deposition of Halabi on the 19<sup>th</sup> should be rescheduled.
- We will confer further, but at the moment defendants are not available for deposition on the 11<sup>th</sup> or 12<sup>th</sup>. It's possible something might free up; we should have a better sense of that next week and will let you know if we can make ourselves available for one or both of those dates.
- You also inquired as to our willingness to join a motion to extend all discovery deadlines. We've conferred internally on that, and take the tentative position that such a motion would be premature and unwarranted (and certainly likely to be viewed as such by the court) at this time. We are open to revisiting this issue later, based on further developments.
- Finally, you agreed to provide a copy of Fares's passport and a verification from Shaout in advance of their depositions next week. We would appreciate receipt of those as soon as possible.

Thanks,  
Toni

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